

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

---

STEVEN SEGAL, NICK HAMMER, ROBIN  
HOUGDAHL, and TODD TERRY, on behalf of  
themselves and all other similarly situated

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER, LTD.; TILTWARE, LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA  
CORP. A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON  
JUANDA; JENNIFER HARMAN-TRANIELLO;  
PHILLIP GORDON; ERICK LINDGREN;  
ERIK SEIDEL; ANDREW BLOCH; MIKE  
MATUSOW; GUS HANSON; ALLEN  
CUNNINGHAM; PATRICK ANTONIUS and  
JOHN DOES 1-100

Defendant.

---

Civil Action No.: 11-CV-4521 (LBS)

**DEFENDANTS' NOTICE OF MOTION TO DISMISS  
PLAINTIFFS' COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that Defendants JENNIFER TRANIELLO,<sup>1</sup> ALLEN  
CUNNINGHAM, and ERICK LINDGREN, respectfully submit their Motion to Dismiss  
Plaintiffs' Complaint for Lack of Personal Jurisdiction pursuant to Federal Rule of Civil  
Procedure 12(b)(2).

---

<sup>1</sup> In the Complaint, Plaintiffs refer to Ms. Traniello as "Jennifer Harman-Traniello" or "Harman." We refer to her herein as Ms. Traniello or "Traniello," which is her legal name.

The grounds for Defendants' Motion to Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction are more fully set forth in the accompanying Memorandum of Law filed contemporaneously herewith.

Dated: August 19, 2011

Respectfully submitted,

/s/ A. Jeff Ifrah

A. JEFF IFRAH (Bar No.: AI1627)

Email: jeff@ifrahlaw.com

DAVID B. DEITCH (Bar No.: DD9900)

Email: ddeitch@ifrahlaw.com

IFRAH PLLC

1717 Pennsylvania Avenue, Suite 650

Washington, D.C. 20006-2004

Telephone: (202) 524-4140

Facsimile: (202) 524-4141

Attorneys for Defendants,

*Tiltware, LLC; Vantage, Ltd.; Filco, Ltd.;*

*Pocket Kings Ltd.; Pocket Kings Consulting Ltd.;*

*Howard Lederer; Chris Ferguson; Jennifer*

*Harman-Traniello; Erick Lindgren; Erik Seidel;*

*Andrew Bloch; Mike Matusow; and*

*Allen Cunningham*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19<sup>th</sup> day of August, 2011, a copy of the foregoing Defendants' Notice of Motion of Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction, Memorandum of Law in support thereof, and Proposed Order were sent via the ECF filing system and via email to:

Thomas H. Burt  
Beth Landes  
Gregory Nespole  
Lawrence Kolker  
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP  
270 Madison Avenue  
New York, New York 10016

/s/ A. Jeff Ifrah  
A. Jeff Ifrah